

Mr. Trahos' proposal to allow foreign non-amateurs to use U.S. amateur radio frequencies is, without doubt, one of the most absurd proposals I've ever seen in my 45 years as an amateur radio operator.

First, Mr. Trahos' idea would put unlicensed operation right into the middle of a very popular amateur band where repeaters and repeater control channels abound, especially in the large population centers where foreign tourists are likely to visit. In fact, this repeater band is so popular that some areas of the country (Southern California is a notable example) have gone to 20 khz channel spacing and reduced FM deviation (instead of the usual 25 khz spacing) to open up more channels and ease the high demand for repeater channels that can be coordinated. To allow unlicensed operation in the middle of this congested part of the spectrum is absurd at best.

Second, this proposal is the "camel's nose under the tent." If we allow U.S. citizens who are not hams to communicate with the visitors within a ham band, it would not take long before that piece of spectrum would become totally unmanageable. If the CB debacle has taught us anything, it is that non-hams will buy or alter radios to go into other parts of the spectrum, just as some 11-meter CBers have moved illegally into the 10-meter amateur band. Indeed, unlicensed people could simply buy any one of the many 440 mhz radios available at Radio Shack or ham radio stores, just as CBers buy ham gear or convert CB gear to go onto 10 meters. This would be catastrophic to legitimate amateur repeater operation.

My third comment has to do with enforcement of operational and technical standards (frequency, deviation, power levels, operating frequencies, etc.). The potential for interference to amateur systems from this highly mobile group of users using inexpensive radios is substantial, and in this era of significant budget restraints, it would be virtually impossible for the FCC to ensure that such operation does not interfere with legal and legitimate operations on duly coordinated amateur repeater systems. We only have to look to CB and Family Radio Service (FRS) to get a clear picture of the potential problems. Enforcement in the new band is not likely to be any different.

Finally, I offer this thought: if a foreigner really needs a radio while in this country, he/she can buy a pair of FRS radios at Radio Shack (or on the Internet, etc.) for very little money (often \$60-\$70 a pair). Surely, if such a person can afford to travel here, they can afford a pair of FRS walkie-talkies.

In conclusion, enabling unlicensed operation in an otherwise well-coordinated amateur band is ill-conceived and destined to create big problems for repeater owners and users. Ham repeater systems have traditionally been used in times of emergency and for other activities benefiting the community. We must not allow the degradation of this resource. Please throw this proposal in the wastebasket where it belongs!

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